

## Jeffrey Gavenman

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**From:** A Delgado <ajdelgado@outlook.com>  
**Sent:** Saturday, July 6, 2024 8:33 AM  
**To:** Jeffrey Gavenman  
**Subject:** Re: Confirmation

Mr. Gavenman,

The email is relevant on multiple grounds and related to multiple avenues, including **but not limited to** the hostile work environment claim and, moreover, indication of how little the Campaign protected its employees. My RFP requested any and all documents relevant to any of the claims in my Complaint. Thus, it is responsive and should have been produced, regardless of whether it was "produced by Denson" or whomever. The point is, the Campaign has it.

If you do not wish to hand it over cooperatively, I can certainly file a motion. But Mr. Blumetti, your predecessor, was diligent and cooperative and did not waste the court's time, e.g., he voluntarily produced an email, which was produced in the Denson case, but not in mine, and promptly corrected the lack-of-production, when I brought it to his attention.

P.S. It is two emails, not one.

Thank you

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**From:** Jeffrey Gavenman <jgavenman@schulmanbh.com>  
**Sent:** Friday, July 5, 2024 7:32 PM  
**To:** A Delgado <ajdelgado@outlook.com>  
**Subject:** RE: Confirmation

My email is neither incorrect nor incomplete. As is clearly written below, my email addresses all types of written complaints described in ECF No. 371, which, as you know, includes emails and letters from an attorney regarding possible legal action. See ECF No. 371, p. 2.

Are you referring to an email produced by Denson in the Denson case? Why would an email sent by someone's mother, which you, apparently, have never seen, be relevant to your case? And, to which of your RPDs would such a document be responsive?

Best,  
Jeff

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**From:** A Delgado <ajdelgado@outlook.com>  
**Sent:** Thursday, July 4, 2024 7:13 PM  
**To:** Jeffrey Gavenman <jgavenman@schulmanbh.com>  
**Subject:** Re: Confirmation

Your declaration is incorrect and incomplete.

The judge clarified that the order was not limited to search terms, ESI searches, or other individuals but even an email or letter from an attorney, regarding potential legal action.

Also, why have you still refused to produce the email from the staffer's mother, referring to me as a "slut" and sent to Campaign officials, twice, which was produced in another case and your client possesses? This should have been produced ages ago, as it shows hostile work environment. I have already asked you for it, you responded and said you would look into it, and then have refused to provide it.

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**From:** Jeffrey Gavenman <[jgavenman@schulmanbh.com](mailto:jgavenman@schulmanbh.com)>

**Sent:** Wednesday, July 3, 2024 3:48 PM

**To:** A Delgado <[ajdelgado@outlook.com](mailto:ajdelgado@outlook.com)>

**Subject:** Confirmation

Ms. Delgado,

Pursuant to ECF No. 371, this email hereby confirms that the Campaign is not withholding "written complaints of the type described [in ECF No. 371], properly requested in discovery, and ordered by [the] Court to be produced." To make it abundantly clear, after a reasonable search, **the Campaign has not located a single shred of support for your bald assertions** regarding written complaints purportedly made by Hannah Castillo or by someone with the initials R.G.; nor, based on the limited information you provided (including ignoring our request for an unredacted version of the text messages), has it located any support for the assertions of the purported "Senior Advisor" found in ECF No. 367-1, to the extent that you are claiming these assertions demonstrate that the Campaign is withholding evidence of other written complaints of gender discrimination, sexual harassment, or pregnancy discrimination, beyond what has already been produced in this case.

Separately, out of an abundance of caution, I wanted to make sure that you have the attached document. It is a public filing that was filed in June 2019 in the Alva Johnson case, for which the Campaign has already produced documents.

I hope you have a good Fourth of July holiday.

Best,  
Jeff

**SCHULMANBHATTACHARYA**

**Jeffrey S. Gavenman**  
**Member**

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